

1 GEORGE T. BOCHANIS, ESQ.
Nevada Bar No.: 2262
2 **GEORGE T. BOCHANIS, LTD.**
631 S. Ninth Street
3 Las Vegas, Nevada 89101
(702) 388-2005
4 Attorney for Plaintiff

ORIGINAL

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

5
6 ANDREAS GOLTSOS, individually)
7) CASE NO.: 2:19-cv-00817-KJD-VCF
Plaintiff,)
8)
vs.)
9)
STATE FARM INSURANCE COMPANY, a)
10 Foreign Corporation; DOE DRIVERS I through X,)
inclusive; DOES XI through XX, inclusive; ROE)
11 CORPORATIONS XXI through XXX, inclusive,)
12 Defendants.)
13

14 **STIPULATION AND ORDER FOR EXTENSION OF PLAINTIFF'S OPPOSITION TO**
DEFENDANT'S MOTION TO DISMISS

15 Defendant STATE FARM INSURANCE COMPANY by and through its attorneys,
16 GEORGE RANALLI, Esq., of the Law Firm of RANALLI, ZANIEL FOWLER & MORAN,
17 LLC, and Plaintiff ANDREAS GOLTSOS by and through his attorney, GEORGE T.
18 BOCHANIS, ESQ., of the Law Firm of GEORGE T. BOCHANIS, LTD., hereby stipulate and
19 agree to continue the due date of Plaintiff's Opposition to Defendant's Motion to Dismiss in this
20 matter from its current due date of May 31, 2019 to June 7, 2019.

21 Defendant filed its Motion to Dismiss Pursuant to FRCP 12(b)(6) on May 17, 2019, and
22 the due date of Plaintiff's Opposition is May 31, 2019.

23 Parties seek a seven day extension of the pending opposition date due an unexpected
24 illness of attorney who was preparing the Opposition.

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26 ///

Said request is not being made for the purposes of delaying discovery or the trial of this matter.

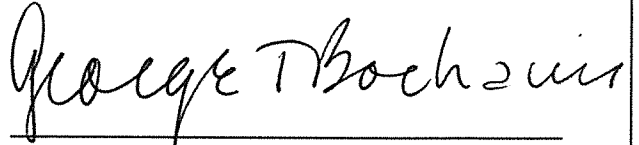
SO AGREED.

DATED this ____ day of May 2019.

DATED this 29 day of May 2019.

**RANALLI ZANIEL FOWLER &
MORAN, LLC**

GEORGE T. BOCHANIS, LTD



George M. Ranalli, Esq.
Nevada Bar No. 5748
2400 W. Horizon Ridge Pkwy
Henderson, Nevada 89052
*Attorneys for Defendant State Farm
Insurance Company*

George T. Bochanis, Esq.
Nevada Bar No. 2262
631 S. Ninth Street
Las Vegas, Nevada 89101
Attorney for Plaintiff Andreas Goltsos

ORDER

BASED ON THE STIPULATION OF THE PARTIES and good cause appearing
therefore,

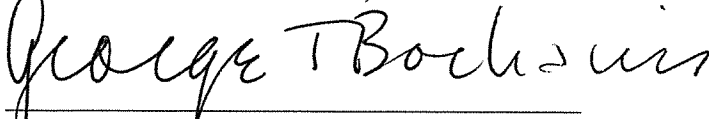
IT IS HEREBY ORDERED that the due date of Plaintiff's Opposition to Defendant's
Motion to Dismiss has been extended to June 7, 2019 by this action.

UNITED STATES

JUDGE

Submitted by:

GEORGE T. BOCHANIS, LTD.



GEORGE T. BOCHANIS, ESQ.

631 South Ninth Street
Las Vegas, Nevada 89101
(702) 388-2005
Attorney for Plaintiff Andreas Goltsos

Said request is not being made for the purposes of delaying discovery or the trial of this matter.


SO AGREED.

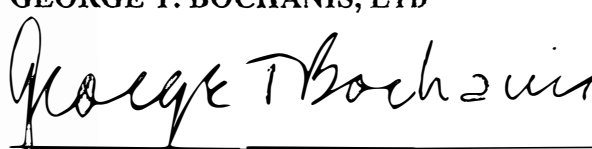
DATED this 29 day of May 2019.

DATED this 29 day of May 2019.

**RANALLI ZANIEL FOWLER &
MORAN, LLC**

GEORGE T. BOCHANIS, LTD


George M. Ranalli, Esq.
Nevada Bar No. 5748
2400 W. Horizon Ridge Pkwy
Henderson, Nevada 89052
*Attorneys for Defendant State Farm
Insurance Company*


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Nevada Bar No. 2262
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Las Vegas, Nevada 89101
Attorney for Plaintiff Andreas Goltso

ORDER

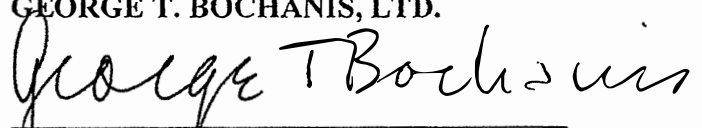
BASED ON THE STIPULATION OF THE PARTIES and good cause appearing therefore,

IT IS HEREBY ORDERED that the due date of Plaintiff's Opposition to Defendant's Motion to Dismiss has been extended to June 7, 2019 by this action.


UNITED STATES DISTRICT JUDGE

Submitted by:

GEORGE T. BOCHANIS, LTD.


GEORGE T. BOCHANIS, ESQ.

631 South Ninth Street
Las Vegas, Nevada 89101
(702) 388-2005
Attorney for Plaintiff Andreas Goltso